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<i>James R. Watson Jr.,</i> Plaintiff, v. <i>Meta Platforms Technologies, LLC,</i> <i>LSC Global</i> Defendant.	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA FLORENCE DIVISION Civil Action No.: _____
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COMPLAINT

Plaintiff James R. Watson Jr., appearing pro se, states the following as his Complaint against Defendant Meta Platforms Technologies, LLC:

JURISDICTION AND VENUE

1. This Court has jurisdiction under 28 U.S.C. § 1332 because the amount in controversy exceeds \$75,000 and the parties are citizens of different states.

2. Venue is proper under 28 U.S.C. § 1391 because a substantial part of the events occurred in this district and Plaintiff resides in Florence County, South Carolina.

PARTIES

3. Plaintiff is a natural person and citizen of South Carolina, residing at 102 Magnolia Dr., Florence, SC 29506.

4. Defendant Meta Platforms Technologies, LLC is a Delaware limited liability company with its principal place of business in Menlo Park, California, and operates the Instagram platform. It may be served through its registered agents at:

2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833

FACTUAL ALLEGATIONS

5. Plaintiff was the owner and user of Instagram account @dijwattslive, which he used for business and professional branding.

6. In or around 2018, Plaintiff's account was compromised as a result of a widely reported data breach affecting Instagram.

B. The Defendant(s)/Third-Party Plaintiff(s)

Provide the information below for each defendant/third-party plaintiff named in the complaint. Attach additional pages if needed.

Name	META PLATFORMS TECHNOLOGIES LLC
Street Address	1601 WILLOW ROAD
City and County	MENLO PARK
State and Zip Code	California 94025
Telephone Number	
E-mail Address	

C. The Third-Party Defendant(s)

Provide the information below for each third-party defendant named in the complaint, whether the third-party defendant is an individual, a government agency, an organization, or a corporation. For an individual third-party defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Third-Party Defendant No. 1

Name	MELISSA DEKOVEN
Job or Title (<i>if known</i>)	CA Registered Corporate (1505) Agent Authorized Employee(s)
Street Address	2710 GATEWAY OAKS DRIVE, SUITE 150N
City and County	SACRAMENTO
State and Zip Code	California
Telephone Number	1-800-927-9801 x 62615
E-mail Address (<i>if known</i>)	melissa.dekoven@cscglobal.com

Third-Party Defendant No. 2

Name	Tiffany O'Neal (she/her)
Job or Title (<i>if known</i>)	CA Registered Corporate (1505) Agent Authorized Employee(s)
Street Address	2710 GATEWAY OAKS DRIVE, SUITE 150N
City and County	SACRAMENTO
State and Zip Code	California
Telephone Number	Phone 1: 888-690-2882 Phone 2: 302-636-5401 x65476
E-mail Address (<i>if known</i>)	tiffany.oneal@cscglobal.com

7. Plaintiff submitted numerous reports and support requests through Instagram's channels but received no assistance.

8. On June 5, 2025, Plaintiff served a Final Demand Letter to nine registered corporate agents of Meta at their Sacramento address. No response or action was taken.

9. The account remains unrecovered, preventing Plaintiff from conducting business, marketing services, and engaging with clients.

CLAIMS FOR RELIEF

Count I – Negligence

10. Defendant owed Plaintiff a duty to protect his personal data and respond to breach-related incidents.

11. Defendant breached that duty by failing to provide support or account recovery, even after notice.

12. Plaintiff suffered financial loss, reputational harm, and emotional distress as a result.

Count II – Breach of Duty / Gross Inaction

13. Defendant failed to maintain proper user support procedures or designate adequate staff to handle breach recovery.

14. The delay and total lack of remedy, despite multiple notices, constitute gross inaction and misconduct.

Count III – Damages from Data Breach and Business Interruption

15. Plaintiff has suffered the following damages:

- \$39,498 in documented lost business income
- \$157,992 in punitive damages for disruption and distress
- \$71,392.99 in unrecovered educational investment
- \$5,000 in business rebranding and vehicle wrap marketing costs
- \$10,000 in legal and administrative costs

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests:

1. Judgment in the amount of \$283,882.99
2. An order requiring reinstatement and restoration of Plaintiff's Instagram account @djwattslive
3. Trial by jury
4. Such other relief as the Court deems just and proper

Respectfully submitted,



James R. Watson Jr.

Pro Se Plaintiff

102 Magnolia Dr.

Florence, SC 29506

843-687-1264

jwattslive@gmail.com

Date: July 22, 2025